

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: BARBARA L. SMITH, ET AL. v. ETHICON, INC., ET AL. Case No. 2:12-cv-04791	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE WAVE 11
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NOTICE OF VIDEO DEPOSITION OF BARBARA SMITH

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned attorneys for defendants Ethicon, Inc. and Johnson & Johnson, pursuant to FED. R. CIV. P. 30 and the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, will take the deposition upon oral examination of the following person on the date, at the time and at the place set forth below:

Deponent	Location	Date	Time
Barbara Smith	Hilton Garden Inn Portland Airport 12048 Northeast Airport Way Portland, OR 97220	June 18, 2019	9:00 a.m. PDT

PLEASE TAKE FURTHER NOTICE that said depositions shall be videotaped and shall take place before a duly qualified Notary Public authorized to administer oaths and shall continue from day to day until completed. Said depositions shall cover all matters relevant to the subject

matter of the within action.

PLEASE TAKE FURTHER NOTICE that the persons to be examined are required to produce any document reviewed by the deponents, prior to the commencement of the depositions, to prepare for the depositions and/or to refresh the deponent's recollection regarding the facts of this case, as well as all documents requested on Schedule A.

Dated: May 16, 2019.

Respectfully submitted,

/s/ Amy Pepke

Amy Pepke

Butler Snow LLP

6075 Poplar Ave., Suite 500

Memphis, TN 38119

Telephone: (901) 680-7200

Facsimile: (901) 680-7201

Email: amy.pepke@butlersnow.com

**Counsel for Defendants Ethicon, Inc. and
Johnson & Johnson**

SCHEDULE A

The deponent shall bring to the deposition the following documents that are in his/her possession, control or custody:

1. Documents you reviewed to prepare and complete the Plaintiff's Profile Form.
2. Documents you reviewed to prepare and complete the Plaintiff's Fact Sheet.
3. To the extent not previously produced, all documents identified in Section VII of the Plaintiff Fact Sheet.
4. To the extent not previously produced, all documents identified in Section VIII of the Plaintiff Fact Sheet.
5. To the extent not previously produced, all documents in your possession, control or custody concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse.
6. All documents that you have reviewed prior to your deposition concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse, including, without limitation, patient brochures, IFUs, DVDs and FDA Health Notifications.

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

Respectfully submitted,

/s/ Amy Pepke
Amy Pepke